

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
No. 3:22-CV-0191-MOC-DCK

KANAUTICA ZAYRE-BROWN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	AFFIDAVIT OF
	)	MIRANDA RICHARDSON
THE NORTH CAROLINA DEPARTMENT	)	
OF PUBLIC SAFETY, et al.,	)	
	)	
Defendants.	)	

I, Miranda Richardson, am an adult over the age of 18 years, have never been judged incompetent, and testify to the following based on my personal knowledge and expertise.

1. I make this affidavit of my own free will, stating facts of which I have personal knowledge, except as to those matters stated herein upon information and belief, and as to those, I believe them to be true.

2. I serve as the warden of Anson Correctional Institution, a correctional facility administered by the North Carolina Department of Public Safety, Division of Adult Corrections.

3. I have been a warden for eight years and more specifically have been the warden at Anson C.I. since October 2018. I have worked for the Department of Public Safety as a correctional professional for 28 years.

4. Kanautica Zayre-Brown was transferred to Anson C.I. from Warren C.I. on August 15, 2019. When she arrived, I had concerns regarding how she would be accepted by the female population given her transgender status and the publicity related to her transfer from a male facility. I met with Zayre-Brown immediately upon her arrival to discuss her expectations as well as the

facility's expectations of her. Zayre-Brown integrated into the female population here at Anson without any notable incident and she has been broadly accepted by her peers and by the staff.

5. She has accessed available programming and participated in social opportunities, including serving as emcee at the offender talent show. She has made friends, she is civil and social, and she appears to have integrated well. As far as housing, programming, and privileges are concerned, she is treated exactly like any other female offender in terms of daily management.

6. Zayre-Brown was advised upon her arrival, and has been told on many occasions since, that if she has difficulties with staff regarding her transgender identity, such as being misgendered or misnamed, she is to respectfully correct the staff and, if the behavior continues, to let us know so that it can be addressed. She has followed this process as directed and, in the nearly three years since she arrived at this facility, two staff have been informally counselled to correct their communications with her.

7. Overall Zayre-Brown is doing well at Anson C.I. She incurred a disciplinary infraction in December of 2020 for fighting, which resulted in her demotion from Medium Custody to Close Custody, but she has not incurred any infraction since then and has been promoted back to Medium Custody based on her sustained good behavior.

8. I understand that our agency's position is that transgender offenders are to be treated equally to cisgender offenders and that discrimination, harassment, or retaliation will not be tolerated. I agree with this position. Our facility discusses transgender management issues on a regular basis at staff line-up prior to shifts and during administrative meetings. Issues discussed include the importance of avoiding misnaming and misgendering. Training on transgender issues is available through the LMS system and mandatory transgender training is periodically required of all staff.

9. I take seriously any report of retaliation, harassment, or discrimination received from an offender. Such reports are promptly investigated and, if valid, they are immediately addressed and the corrective action is documented.

10. To date, while housed at Anson, Plaintiff did not report any instances of physical or sexual assault by other incarcerated persons or staff.

11. To my knowledge there are more than 20 transgender offenders currently housed at Anson C.I. The vast majority of them are doing well, including Ms. Zayre-Brown. I strive to treat all offenders with respect and consideration without regard to gender identity and I expect my staff to do the same.

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**VERIFICATION PAGE FOLLOWS**

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Pursuant to 28 U.S.C. § 1746, I declare that the foregoing is true and correct.

This the 15 day of July, 2022.

  
MIRANDA RICHARDSON, WARDEN